

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

FLAVIA BENITEZ,
Plaintiff,

v.

SODEXHO MARRIOTT SERVICES,
Defendant.

C.A. No: 04-11959-NG

AFFIDAVIT OF BRIAN M. HANEY

I, Brian M. Haney, having first been duly sworn, hereby depose and state:

1. I am an attorney with the law firm of Cooley Manion Jones LLP, licensed to practice law in Massachusetts and admitted to the United States District Court for the District of Massachusetts.
2. I represent Sodexho Marriott Services in the above-referenced matter.
3. A true and accurate copy of the following documents are attached hereto as Attachments:
 - A. "Medical Records Authorization";
 - B. Scheduling Order of February 2, 2006 (Dein, USMJ);
 - C. "Authorization To Disclose Information To";
 - D. April 14, 2006 letter to Flavia Benitez from Brian M. Haney (with enclosure)
 - E. April 18, 2006 letter to Flavia Benitez from Brian M. Haney (with enclosure)
 - F. April 26, 2006 letter to Flavia Benitez from Brian M. Haney;
 - G. Scheduling Order and Order on Plaintiff's Motions to Compel, for Protective Order, for Appointment of Counsel and for a Technical Legal Interpreter of June 6, 2006 (Dein, UDMJ);
 - H. Invoice No. P599954 of Medical Record Associates, Inc.; and

- I. Authorization to Obtain, Use, and Disclose Protected Health Information completed by Flavia Benitez for "Cambridge Health."

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 22nd DAY OF JUNE, 2006.

/s/ Brian M. Haney
Brian M. Haney